

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

LONE STAR TECHNOLOGICAL  
INNOVATIONS, LLC,

Plaintiff,

v.

ASUSTEK COMPUTER INC.,

Defendant.

Civil Action No. 6:19-CV-00059-RWS

LEAD CASE

DEFENDANT ASUSTEK COMPUTER INC.'S OBJECTIONS AND COUNTER-  
DESIGNATIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS

Pursuant to the Court's Second Amended Docket Control Order (Dkt. 140), Defendant ASUSTeK Computer Inc. respectfully submits the following objections and counter-designations to Lone Star's March 23, 2021 Preliminary Designation of Deposition Testimony/Video:

**Mr. Jaime Morquecho**

Lone Star Designation	Counter Designation	Objections
7:5-8:4		
:23-9:11		Designation is incomplete; lacks foundation
12:5-20	12:21-23	Outside the scope of 30(b)6; lacks foundation
12:24-13:4	13:5-6	
13:7-8		Incomplete; lacks foundation
17:25-9	18:15-19:3	Lacks personal knowledge
19:14-20	19:4-13	Incomplete; lacks foundation
23:12-24:5	24:6-11	Lacks personal knowledge
24:12-16	24:17-18	Misstates testimony; lacks foundation
29:16-21	19:22-24	
29:25-30:2	30:3-8	Vague; question is compound
30:9-23		
32:1-33:15	33:16-34:6	
39:9-16		

Lone Star Designation	Counter Designation	Objections
40:18-41:3	41:4-15	
52:20-54:9	54:10-56:4	
56:5-14		
57:2-58:8		
59:1-14		Incomplete; lacks foundation

**Mr. James Lee**

Lone Star Designation	Counter Designation	Objections
10:19-22	9:16-10:18; 12:15-13:10; 19:5-12	Lacks foundation; misstates testimony
14:1-2	14:3-6	
14:7-25	15:1-3	Outside the scope of 30(b)6; lacks foundation
15:4-7		
15:12-15		
16:8-18	16:19-21	Lacks foundation
16:22		Incomplete; lacks foundation
17:14- 23	17:24-18:8	Lacks foundation; misstates testimony
18:9-23	18:24-25	Lacks foundation; misstates

Lone Star Designation	Counter Designation	Objections
		testimony
19:1-4		Lacks personal knowledge
20:1-22	19:24-25	Incomplete; no question designated;
22:2-13	22:14-16	
22:17-23:19	22:18-19	Lacks personal knowledge;
23:23-25:8	25:9-13	
25:14-27:2	27:3-10	Mischaracterizes the record; misstates testimony
27:16-20		
28:12-18	28:19-29:7	
29:15-30:5	30:6-13	
30:19-21		Not relevant; designation likely made in error; not admissible
37:16-38:1	38:2-4	Incomplete; no question designated
38:5-7	38:8-10	

Lone Star Designation	Counter Designation	Objections
47:22-48:6	48:7-49:22	Lacks foundation; incomplete hypothetical; misstates record
52:25-53:7	53:8-14	
53:15-54:6		
54:21-54:24		

Defendant reserves the right to supplement these counter designations. Defendant further reserves the right to use impeachment testimony at trial in accordance with all applicable rules.

Dated: April 6, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

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